

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:	Chapter 13 Case
Paul Hansmeier,	Bky. No. 15-42460 (KHS)
Debtor.	

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OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

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1. Best & Flanagan LLP (“B&F”) is the holder of five judgments (the “Judgments”) against Paul Hansmeier (the “Debtor”) by virtue of assignments filed in the Hennepin County District Court, Court File No. 27-cv-12-20976, and by representation in the companioned Court File No. 27-cv-14-15391. The Judgments are in favor of B&F, Paul Godfread, Esq., Phillip Gainsley, Esq., Thompson Hall Santi Cerny & Katkov (formerly Thompson Hall Santi Cerny & Dooley), and Sandipan Chowdhury, through his counsel Booth Sweet LLP (collectively, “Judgment Creditors”). With costs, additional sanctions, and interest as of the date of the petition, the Judgments total approximately \$193,000.

2. The Judgments are mostly identified in the Debtor’s schedules, although interest, costs, and additional sanctions are not identified. The Judgments were based on the Debtor’s bad-faith litigation and attempted fraud on the courts in the pursuit of various “copyright trolling” lawsuits. The Judgments, and pursuit of collection on the Judgments, are what purportedly gave rise to the Debtor’s petition.

3. This bankruptcy case was commenced by petition filed by the Debtor under Chapter 13 of Title 11 of the United States Code on July 13, 2015. This case is now pending before this Court. The confirmation hearing, originally scheduled for September 17, 2015, has

been re-scheduled for October 15, 2015 by agreement of all parties, although the undersigned has not yet seen a received notice of a rescheduled confirmation hearing date.

4. Although the Trustee has indicated that the Debtor must amend his schedules and plan, and although the Debtor has indicated he intends to file an amended plan, he has not done so to date, and thus Judgment Creditors file this Objection to the only plan now on file with the Court.

5. On August 12, 2015, the undersigned attended the Meeting of Creditors. At the Meeting of Creditors, the Debtor stated on the record that he had transferred significant amounts of money to his wife. Further, the Debtor agreed to provide the undersigned certain documents, namely, income tax returns and financial records, including records for the Debtor Paul Robert Hansmeier, his businesses including Class Justice PLLC, his wife Padraigin L. Browne, and the Debtor's "Monyet LLC" trust, however, to date, some but not all such records have been provided.

6. B&F is entitled to investigate transfers of the Debtor's property, or property of the estate, that may be fraudulent, preferential as to the Debtor's creditors, or that are designed to conceal assets that would affect the Debtor's proposed plan, his ability to repay his debts, and the circumstances under which he should be required to pay his debts. B&F filed an application for an order authorizing a 2004 examination, to which the Debtor has indicated he does not object, and that application is scheduled for hearing on October 7, 2015. B&F incorporates its evidence and arguments in support of its application for a 2004 examinations herein, including evidence that the Debtor has transferred substantial assets to his wife and to the Monyet trust.

7. The Debtor's proposed plan to repay \$142,570 fails to take into account all of his assets, specifically, those assets he has transferred into his wife's name or into the names of other

entities yet that remain in his control. Further, the Debtor's proposed plan to repay \$142,570 fails to identify the correct amount of judgments and liabilities owing as of the date of his petition, which exceed \$142,570. Any Chapter 13 plan should include a complete evaluation of the Debtor's assets and debts, including his transfers of assets to his wife, to another entity or person, or into a trust. B&F reserves the right to amend its objections in the event the Debtor files an amended plan.

Respectfully submitted,

Date: September 16, 2015

BEST & FLANAGAN LLP

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